

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs and Counterclaim Defendants,

- against -

MUFG UNION BANK, N.A. and GLAS
AMERICAS LLC,

Defendants and Counterclaim Plaintiffs.

No. 19 Civ. 10023 (KPF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Christopher J. Clark, as well as the exhibits attached thereto, and the accompanying Memorandum of Law, the undersigned, on behalf of Defendants and Counterclaim Plaintiffs MUFG Union Bank, N.A. (the “Trustee”) and GLAS Americas LLC (the “Collateral Agent”), hereby move this Court before the Honorable Katherine Polk Failla, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Courtroom 618, New York, New York 10007, for an Order striking the June 9, 2020 Letter to Judge Katherine Polk Failla from Ambassador Carlos Vecchio (ECF No. 80) and any references to such submission within the Memorandum of Law in Support of Plaintiffs’ Motion for Summary Judgment (ECF No. 95), and for such other relief as this Court deems just and proper.

Dated: Greenwich, Connecticut
June 26, 2020

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Christopher J. Clark

Christopher J. Clark

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Plaintiffs MUFG Union Bank, N.A. and
GLAS Americas LLC, in their respective
capacities as Trustee and Collateral Agent,
under the Indenture dated October 27, 2016,
and the Pledge and Security Agreement
dated October 28, 2016, governing
PDVSA's Senior Secured Notes due 2020*